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September 7, 2022

Hon. George B. Daniels United States District Court U.S. Courthouse 500 Pearl Street New York, New York 10007

> Re: United States v. Mendoza, et al 21 Cr. 21 (GBD)

SO ORDERED:

B. Daniels, U.S.J.

Dated: SEP 1 3 2022

Dear Judge Daniels:

I am the assigned CJA counsel for defendant Christian Cruz in the above referenced case. I write today to respectfully request authorization for the expenditure of CJA funds to retain the services of Clara S. Kalhous, Esq. as associate counsel to assist me in defending Mr. Cruz. Ms. Kalhous has assisted several S.D.N.Y. counsels, including me, in the past as an associate counsel and, in fact, just this past October Ms. Kalhous served as associate counsel to me in a trial before Judge Preska (United States v. Adelekan, 19 Cr. 291 (LAP)) and her assistance was first rate. Ms. Kalhous is experienced and adept at reviewing digital discovery, preparing legal memoranda and preparing for and assisting at trial. She would be an invaluable addition to Mr. Cruz' defense.

As Your Honor is aware, the discovery in this case is voluminous. Accordingly, should Your Honor be inclined to grant this application it is respectfully requested that Ms. Kalhous be approved at the rate of \$110.00 per hour for an initial period of 35 hours with leave to request additional funding should the need arise. Of course, every effort will be made to avoid duplication of the work load.

Thank you for your consideration to this request and continued courtesies to counsel.

Respectfully submitted,

Richard H Rosenhera

cc.: Clara Kalhous, Esq.